

## REMARKS

### I. Introduction

In response to the Office Action dated January 10, 2007, claim 1 has been amended, and claims 5-12 have been added. Claims 1-12 remain in the application. Re-examination and re-consideration of the application, as amended, is requested.

### II. Specification Amendments

The specification was objected to for containing an attorney docket number.

Applicant notes that there is no statute, rule, or MPEP section stating that the attorney docket number is improper or should not be included. In this regard, the objection is improper. Nonetheless, in the interest of expediting prosecution, Applicants have amended the specification to remove the reference to the docket number. Such amendments were not required for patentability or to distinguish the invention over the prior art.

### III. Prior Art Rejections

In paragraphs (4)-(5) of the Office Action, claims 1-4 were rejected under 35 U.S.C. §103(a) as being unpatentable over Spyglass Prism Concepts and Applications (Spyglass).

Specifically, the independent claims were rejected as follows:

In regard to independent claim 1, Spyglass teaches a proxy server for customizing Web pages in order to conform to constraints of multiple non-PC output devices (Spyglass page 2 - at top). Web pages typically contain illustrations, drawings, etc., as evidenced by the Web page at Spyglass page 7, showing a map of Chicago (a form of drawing). Although Spyglass does not forcefully disclose its application as a "graphics" program, nevertheless, Spyglass's editing and customizations of Web images (see Spyglass page 5) provides reasonable suggestion to one of ordinary skill in the art at the time of the invention that Spyglass entails graphical editing, providing the benefit of such editing for Web pages containing images (compare with claim 1 "*A computer implemented method for associating multiple output devices with a drawing in a computer-implemented graphics program comprising:*").

Spyglass teaches a user logging on to the Spyglass server, said server looks for a Web page (i.e. drawing) via user requested URL within its cache. If its stored page is already converted (a first layout), said server selects said page on behalf of the user (Spyglass page 2, and page 3 section "Caches content", and page 5 - top paragraph; compare with claim 1 "*selecting a first layout of said drawing*").

Spyglass teaches a "Device Database" which stores various device information and conversion characteristics for conversion purposes (Spyglass page 2, 4). Spyglass references this database accordingly (compare with claim 1 "*selecting a first output device; selecting a first output device configuration*").

Spyglass teaches fetching from its cache a Web page which has already been converted for a specific output device (Spyglass page 5 - top paragraph). In order to recognize the correct converted page (layout), Spyglass must know the intended output device with its device configuration, therefore

an association exists accordingly (compare with claim 1 “*associating said first layout with said first output device and said first output device configuration*”).

Spyglass teaches a user logging on to the Spyglass server using a different device, said server looks for a Web page (i.e. drawing) via user requested URL within its cache. If its stored page is already converted (a first layout), said server selects said page on behalf of the user (Spyglass page 2, and page 3 section “Caches content”, and page 5 - top paragraph; compare with claim 1 “*selecting a second layout of said drawings*”).

Spyglass teaches a “Device Database” which stores various device information and conversion characteristics for conversion purposes (Spyglass page 2, 4). Spyglass references this database accordingly (compare with claim 1 “*selecting a second output device; selecting a second output device configuration*”).

Spyglass teaches fetching from its cache a Web page which has already been converted for a specific output device (Spyglass page 5 - top paragraph). In order to recognize the correct converted page (layout), Spyglass must know the intended output device with its device configuration, therefore an association exists accordingly (compare with claim 1 “*associating said second layout with said second output device and said second output device configuration*”).

Applicant traverses the above rejections for one or more of the following reasons:

- (1) Spyglass does not teach, disclose or suggest associating both a first layout and a second layout with a first output device and second output device respectively within the same drawing;
- (2) Spyglass does not teach, disclose or suggest associating both a first layout and a second layout with a first output device configuration and second output device configuration respectively within the same drawing;
- (3) Spyglass does not teach, disclose or suggest associating a first layout with a first output device and first output device configuration, and a second layout with a second output device and second output device configuration within the same drawing;
- (4) Spyglass does not teach, disclose or suggest an associating that is within a drawing of two different output devices and two different layouts for the drawing; and
- (5) Spyglass does not teach, disclose, or suggest a computer-implemented graphics program.

The independent claims are generally directed to associating multiple output devices with a single drawing in a computer-graphics program. A first layout and second layout of the same drawing are selected. A first output device and second output device are also selected. Further, a first output device configuration and second output device configuration are selected. Lastly, within the drawing/drawing file, the first layout is associated with the first output device and first output device configuration. Further, within the same drawing/drawing file, the second layout is associated

with the second output device and second output device configuration. Accordingly, the associating occurs within the drawing itself and there are multiple output devices and output device configurations associated with different layouts within the same drawing.

In view of the above, one may understand that the invention allows the user to establish on or more output views, each representing different output devices within the same drawing. Such an invention provides an advantage over the prior art in that the user can establish more than one output device within the same drawing. In the prior art, only one output device can be established at a time and an explicit device change is required to set up and redirect the output to an alternate device.

With respect to the Spyglass reference, Spyglass merely teaches a proxy server application and NOT a computer-implemented graphics program. The Office Action indicates that Spyglass's editing and customizations of Web images provides reasonable suggestions that Spyglass entails graphical editing, providing the benefit of such editing for Web pages containing images. Applicants respectfully disagree with and traverse such an assertion. A proxy server that merely places a web page into a proper format and sends the format to a requesting client is not even remotely similar to a computer-implemented graphics program. Instead, such a proxy server can be viewed as an interpreter that merely rearranges the format of the data based on a set of rules but does not entail the functionality set forth in a graphics program as claimed. In addition, Applicants note that the claims explicitly require and refer to a drawing within the computer-implemented graphics program. Spyglass' website images are not drawings nor are they layouts for such a drawing. Drawing layouts are set forth in the specification (see page 3, lines 1-4; page 12, line 5-page 13, end). Further, the use of layouts in computer graphics programs (e.g., CAD programs) are well defined and have a well-understood meaning in the art. Spyglass does not even remotely refer to or describe such layouts as such terminology is used in the present specification or in the relevant field of art (i.e., computer graphics and CAD programs and NOT proxy server applications).

Nonetheless, even assuming that Spyglass's proxy server is a computer-implemented graphics program (which Applicant's traverse), Spyglass still fails to teach various aspects of the invention as set forth in the claims. As described above, the claims require that multiple output devices and output device configurations are stored or associated within the same drawing/drawing file.

Spyglass fails to teach such a limitation. Instead, Spyglass teaches the use of two databases - a user database (to track information such as user preferences) and a device database (containing characteristics of various devices). When a URL is requested by a user, the Spyglass product intercepts the request, accesses and retrieves data from the URL requested, and uses its stored data about the web site, the user, and the device to convert the data into the best format for the user's device (see page 2). In addition, Spyglass can cache content of previously-retrieved or frequently requested documents (see page 3 and 5).

However, notoriously absent from Spyglass is the ability to store or associate multiple layouts of the same drawing with multiple different output devices/output device configurations within the same drawing. Instead, Spyglass merely retrieves the web content from a URL - thus, the different layouts, output devices, and output device configurations (nor an association between such components) are not stored in or within the drawing - the website data is stored at the URL location and the different formats for the data are stored at the Spyglass proxy server. The website data can also be stored at the Spyglass proxy server but it is stored independently from other formats for the website data.

Spyglass' different converted documents are stored independently within cache. Further, Spyglass does not provide the ability to store or associate different output devices with/within the same drawing. Instead, each converted document stored in Spyglass' cache is for a single type of format and cannot be associated with multiple different output devices. There is no capability or functionality within Spyglass that allows a converted document (which has been converted for a particular user device) to be associated with multiple different devices as claimed. Further, Spyglass fails to provide any capability or functionality to store multiple different associations within the same drawing. Instead, Spyglass' device database merely consists of characteristics of different devices which is accessed to perform the appropriate conversion (that is eventually stored in cache). Such a database is not the drawing itself (and thereby fails to meet the explicit claim limitations). Accordingly, the specific and explicit functionality set forth in the present claims are far from being even remotely hinted at in Spyglass.

Moreover, the various elements of Applicant's claimed invention together provide operational advantages over Spyglass. In addition, Applicant's invention solves problems not recognized by Spyglass.

Thus, Applicant submits that independent claims 1, 5, and 9 are allowable over Spyglass. Further, dependent claims 2-4, 6-8, and 10-12 are submitted to be allowable over Spyglass in the same manner, because they are dependent on independent claims 1, 5, and 9 respectively, and thus contains all the limitations of the independent claims. In addition, dependent claims 2-4, 6-8, and 9-12 recite additional novel elements not shown by Spyglass.

IV. Conclusion

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicant's undersigned attorney.

Respectfully submitted,

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G&C 30566.86-US-D1